

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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David E. Patton  
*Executive Director*

*Southern District of New York*  
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*Attorney-in-Charge*

March 25, 2022

*Via ECF*  
The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

USDC SDNY  
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**MEMO ENDORSED**

Re: *United States v. Pedro Nunez*, 21 CR 612 (ER)

Dear Judge Ramos:

With the consent of Pretrial Services and without objection from the government (who takes no position), I write to seek a modification of Mr. Nunez's bail condition. Specifically, I ask that Mr. Nunez no longer be subject to a curfew condition.

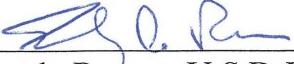
Mr. Nunez has been at liberty subject to bail conditions since his presentment on September 8, 2021. On December 22, 2021, with the consent of Pretrial Services and the government, Mr. Nunez's level of supervision was reduced from home detention to a curfew. Since then, Mr. Nunez has complied with the curfew condition. However, Mr. Nunez is employed at a small grocery store and the curfew condition interferes with his ability to work "double shifts" on short notice or take on other later-evening employment. As such, we ask that the condition be terminated.

Thank you.

Respectfully submitted,

/s/ Julia Gatto  
Julia L. Gatto, Esq.  
Assistant Federal Defender  
212-417-8750

The application is  granted  
 denied

  
Edgardo Ramos, U.S.D.J  
Dated: 3/25/2022  
New York, New York

cc: Kedar Bhatia, Esq. (via ECF)  
USPO Francesca Piperato (via ECF)